UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE TINGO GROUP, INC. DERIVATIVE LITIGATION

Lead Case No. 2:23-CV-20749-ES-MAH

This Document Relates to:

ALL ACTIONS

NOTICE OF MOTION FOR THE PRO HAC VICE ADMISSION OF KEVIN J. O'BRIEN

PLEASE TAKE NOTICE that on November 18, 2024, or such later date as the Court may order, Defendant Ernst & Young Americas LLC, by its undersigned counsel, will hereby move before the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for entry of an Order allowing the admission *pro hac vice* of:

Kevin J. O'Brien, Esq. KING & SPALDING LLP 1185 Avenue of the Americas, 34th Floor New York, NY 10036-2601 212-827-4088 kobrien@kslaw.com

PLEASE TAKE FURTHER NOTICE that the Defendant Ernst & Young Americas LLC will rely upon the accompanying Declarations of Thomas J. Scrivo and Kevin J. O'Brien in support of this motion and that no brief is necessary as this motion raises no issue of law and the relief sought is wholly within the Court's discretion.

PLEASE TAKE FURTHER NOTICE that the undersigned requests waiver of oral argument in submission of this motion pursuant to Rule 78 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

Dated: October 17, 2024

/s/ Thomas J. Scrivo

Thomas J. Scrivo
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